**Adelaide City Council Submission on Draft Strategy for Australia’s Heritage, June 2014**

1. Adelaide City Council welcomes the opportunity to provide comments on the draft Strategy for Australia’s Heritage.
2. The formulation of an overarching strategy for Australia’s heritage is timely.
3. The draft strategy is supported.
4. Adelaide City Council has a long, proud record in heritage survey, management, promotion and interpretation. It is a leader in the local government sector.
5. Owners of local heritage buildings for many years have had access to Council’s Heritage Incentive Scheme, the biggest of its kind in Australia.
6. Over $15 million has been allocated to heritage owners since 1988.
7. Council regularly audits and adjusts its heritage incentive scheme to ensure and increase its effectiveness across residential and non-residential sectors.
8. Council is also active in promotion of heritage and community-based programs including partnerships with the National Trust of South Australia.
9. On 16 April 2014, a new mobile app and website to promote the City’s heritage was launched by Adelaide City Council and the National Trust of South Australia.
10. The draft strategy offers a high-level national framework as well as recording a number of specific proactive measures as commitments and proposed actions for comment.
11. Council is happy to supply further information on its heritage programs if requested – there is information available on our website too.

**State Planning Review**

1. State-led legislative reform is an important context to the formulation of the Draft Strategy for Australia’s Heritage.
2. In February 2013, the South Australian Government appointed an Expert Panel on Planning Reform (none with heritage expertise) to review State planning and related legislation and administration and report to the government by December 2014.
3. Aspects of heritage management fall within the Panel’s terms of reference. The Planning Minister has specifically requested advice and recommendations on local heritage criteria and the listing process.
4. Council has already made submissions to the Expert Panel.
5. Council’s response included a number of observations with a view to improving South Australia’s heritage system.
6. For example:

* National building standards and compliance practices could be adjusted to facilitate use and adaptation of older buildings (not just heritage-listed ones).
* Creating and updating a local heritage list could be faster and far simpler: (This is currently a concern in the Adelaide ‘square mile’ where many heritage buildings remain unprotected despite an expert survey and initial Ministerial support to start a listing process in 2009.)
* Policies and descriptions of heritage significance could be clearer about what may be changed on a listed property and offer more certainty to the owner, other stakeholders and the development assessment process.
* Administration of heritage at State level, eg. two different portfolios and Acts, is inefficient and ineffective. There are obvious benefits in a more unified approach to heritage. (This needs to be backed by adequate funding and commitment.)
* Poor transparency and clarity in the local heritage listing process undermine public understanding and confidence in heritage management.

Table 1 contains Adelaide City Council’s detailed comments on the draft Australian Heritage Strategy.

**Table 1: Specific Comments on draft Strategy for Australia’s Heritage**

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| Elements of draft Australian Heritage Strategy   * The elements of primary relevance to Council’s roles are highlighted in gray. * **Bold** indicates ‘Commitment’. * *Italic* indicates ‘Proposed Action’. | | COMMENTS |
| 1. Leadership | | |
| a. Improved support for Australia’s iconic World Heritage sites | * **Provide support for vital Port Arthur World Heritage restoration works.** * **Provide support to local environment and heritage conservation projects across Australia through the Green Army Programme.** * **Complete the strategic assessment of the Great Barrier Reef World Heritage Area which will help identify, plan for and manage the unique values of this special region.** * **Establish a Reef Trust as part of the Reef 2050 plan for the long-term management and protection of the Great Barrier Reef**. * *Explore innovative approaches to fund the long term protection and management of Australia’s heritage places.* | **The City of Adelaide contains no World Heritage sites at present. It is noted that the Adelaide Park Lands Cultural Landscape Assessment Study (Jones 2007) concluded that there is merit in the Adelaide Park Lands and Squares being considered for a World Heritage nomination.** |
| b. Capture a representative National Heritage List | * **Provide additional support over the next three years to the Australian Heritage Council to help assess our national heritage and advise on its protection.** * *Work with the Australian Heritage Council to:*   + *prioritise thematic studies*   + *explore new research techniques for identifying heritage values that are poorly represented*   + *commit to exploring how the listing process can be streamlined*   + *encourage expert partnerships to help facilitate future assessments.* | **Supported.** |
| c. Pursue greater recognition and protection of our natural and cultural heritage, particularly our Indigenous cultural heritage | * **Encourage training and capacity building in Indigenous communities through the Green Army Programme.** * *Identify priority sites for assessment for potential World Heritage listing, including significant elements of Cape York Peninsula with Indigenous support and Sydney’s Royal National Park.* * *Work with the Victorian Government to pursue National Heritage listing of the Queen Victoria Markets in Melbourne, and then investigate the potential for World Heritage listing.* * *Promote the best practice Ask First Indigenous consultation guidelines.* * *Improve the recognition and protection of Indigenous cultural heritage.* * *Promote the use of the Australia’s Community Heritage web site to record the activities and achievements of the new Green Army and Community Heritage and Icons Programmes.* | **Noted.**  **Another action should be to improve protection and recognition of National Heritage Listed places.** |
| d. Contribute to international heritage standard setting and guidance | * *Continue Australia’s active contribution to World Heritage policy discussions at international forums.* * *Commit to further work with the UNESCO World Heritage Centre to improve and build management and governance capacity when sought by regional countries.* * *Explore application of lessons learnt from Great Barrier Reef strategic assessment for improved management of other World Heritage sites.* | **Noted.** |
| 1. Pursue innovative partnerships | | |
| a. Greater heritage policy and process alignment across all levels of government | * **Develop one stop shop streamlining processes to make it easier to navigate heritage regulations.** * *Improve communication about heritage laws, regulations, policies and decisions to help ensure they are better understood by all, especially for local governments and private owners.* * *Work towards effective complementary recognition and protection of National and World Heritage in relevant jurisdictional environmental heritage laws.* * *Ensure Indigenous Australians have a central role in decision making relating to their heritage while providing protection for traditional areas, objects and languages.* | **With 1891 Local or State Heritage Places in the City of Adelaide, and several hundred others recommended in 2009 still un-listed, Council is familiar with the strengths and weaknesses of relevant State processes. There is, for example, considerable scope to streamline and better integrate the relevant procedures for listing of heritage places to reduce obstacles and delays. In our experience, the process for local listing is more fraught and onerous than the State listing process - in the latter, there is more independent decision-making with the SA Heritage Council making the majority of decisions without Ministerial intervention.**  **Council supports better policy alignment to ensure that identified national, state and local heritage values are properly conserved and presented.** |
| b. Building heritage capacity through workforce support, education and training | * **Establish the Green Army Programme to provide opportunities for young Australians to gain training and experience in environmental and heritage conservation by participating in projects that generate real benefits for Australia’s natural and cultural heritage places.** * *Explore complementary partnerships that build linkages between Green Army heritage projects and innovative education, training and, mentoring opportunities and quality frameworks.* * *Explore opportunities for Indigenous people to access training and career path development in heritage identification, management, promotion and celebration.* | **Council is open to participation in relevant programmes initiated and supported by the Australian Government.** |
| c. Innovative funding, resource sharing and creative partnerships | * **Support the Federation of Australian Historical Societies over the next three years to strengthen engagement with and support for local community heritage groups.** * *Explore the development of new incentives and resource gathering partnerships.* * *Explore setting up a specific heritage platform for crowd-funding.* * *Encourage increased grassroots investment and local business participation through new philanthropic and creative business partnerships.* | **Supported.** |
| d. Foster greater collaboration between heritage and tourism sectors | * **Through the new Community Heritage and Icons Programme, encourage local and regional communities to promote and tell the stories of their local heritage and to explore linkages with local tourism bodies to further promote these heritage experiences.** * *Encourage greater visitation to National Heritage places by enhancing the Australian Government web site to better tell the stories of these places and investigate ways of further promoting these places with tourism bodies.* * *Encourage new ways in which innovative tourism experiences can be developed to encourage greater engagement with the cultural aspects of our heritage places.* * *Pursue improved linkages between the heritage, National Landscapes and tourism sectors to explore better promotion of Australia’s special places*. | **Supported.** |
| 1. Encourage communities to understand and care for their heritage | | |
| a. Creating incentives to care for our heritage | * **Deliver benefits for heritage and for the community through Community Heritage and Icons Programme funding to support local historical or heritage groups for the conservation, development and exhibition of our local cultural heritage.** * **Through the Green Army Programme, bring young people together with heritage managers to learn about heritage conservation and restoration projects.** * *Encourage additional support from other government agencies and private heritage organisations to add value to worthwhile conservation projects* | **Supported.**  **Council’s heritage incentive scheme promotes additional investment in conservation and adaptive re-use.**  **State government support in South Australia is inadequate as a result of disproportionate budget cuts. Discontinuation of a well-regarded heritage advisory service, for example, shifted cost to local government.**  **However, in South Australia, heritage management is a largely a discretionary role for local government. Adelaide City Council supports local, state and national heritage, but clearly, not all Councils have capacity to do so or to the same extent.**  **Without a stronger State commitment, including reinstatement of heritage programs formerly administered by the State Heritage branch, it is difficult to see how the current gaps in heritage protection will be filled. Only 50% of Councils in South Australia have prepared a local heritage list.** |
| b. Promoting greater knowledge and engagement with our heritage | * **Work cooperatively with the United Kingdom Government to secure on long term loan Matthews Flinders’ original 1804 map of Australia, the first complete map of our continent.** * *Explore partnerships to establish a single entry point information portal for access to heritage information at all levels (world, national, state and territory and local).* * *Improve public access to heritage information through new technologies, social media and plain English government online nomination/application forms.* * *Enhance Australia’s Community Heritage web site to allow greater public interaction, allowing them to share their heritage stories.* * *Encourage grant recipients to publish their project success stories on the Australia’s Community Heritage web site.* * *Enhance the National Heritage web site to include a competition that allows people to nominate their best loved Australian heritage place or icon.* | **Supported.** |
| c. Appropriate timing for the national celebration of Australia’s heritage | * **To increase community engagement with Heritage Week, investigate whether the date should be shifted to enable greater local engagement in heritage activities.** | **Noted.** |
| d. Management of heritage places | * *Explore the further development of national standards and best practice guidelines for conservation and management of heritage places.* * *Work with the Australian Heritage Council to provide appropriate monitoring and evaluation methods to:*    + *help managers develop practical arrangements for protecting the values of heritage listed places, and*   + *build a more comprehensive understanding of the condition of our collective national heritage.* | **Supported.**  **There is no mention of an earlier agreement by Heritage Ministers to adopt *nationally-consistent criteria for assessment of significance*. While sound in concept, Council is potentially affected because alignment could mean some different eligibility criteria for local heritage places in South Australian legislation.**  **Council has undertaken comprehensive surveys of the Park Lands and Adelaide ‘square mile’ in the past 8 years or so based on the current (1993) legislation. However, passage of local heritage place proposals though the State review process is very slow. Criteria change mid-stream would have mixed consequences. It may even expose places that were recipients of public conservation grants to pressure for de-listing.**  **Should established listings be inviolate unless there is material change to heritage fabric that diminishes value or there are grounds to reconsider significance based on new factual evidence?**  **An *open, independent hearing and peer review* conducted by Planning Panels Victoria after public consultation appears to be a better way of giving timely advice to Councils, supporting consistent expert interpretation of statutory criteria in the assessment of heritage significance, and instilling greater public confidence in heritage decisions. For similar reasons, South Australia would also benefit from clear published guidelines on assessment of significance of local heritage places as exists in other States (eg. NSW). The need for clear guidelines has been raised before (eg. Productivity Commission in its 2006 inquiry).**  **Community support for heritage and good mix of well-administered regulatory and non-regulatory measures should be complementary. Sub-optimal resourcing, transparency and legitimacy of decision-making can undermine this. Recent debate has focused devolution of matters of national or international heritage significance to State level. However, there is equally a strong case for the principle of subsidiarity to operate in respect to local heritage to a greater degree.** |
| e. Models for recognition of Australian heritage champions | * *Explore the best approaches for the recognition of Australian heritage champions.* | **Noted.** |